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DLJ MORTGAGE CAPITAL, INC.,

Plaintiff,

vs.

FIDELITY NATIONAL TITLE GROUP,
INC., et al.,

Defendants.

Case No.: 2:20-cv-02251-APG-DJA

**STIPULATION AND PROPOSED
ORDER EXTENDING DEFENDANT
CHICAGO TITLE INSURANCE
COMPANY'S TIME TO RESPOND
TO MOTION FOR REMAND [ECF No.
10] AND MOTION FOR FEES AND
COSTS [ECF No. 11]**

(First Request)

1 Defendant Chicago Title Insurance Company (“Chicago Title”) and Plaintiff DLJ
2 Mortgage Capital, Inc. (“DLJ”) (collectively, the “Parties”), by and through their counsel of
3 record, hereby stipulate and agree as follows:

- 4 1. On December 13, 2020, DLJ filed its Complaint in the Eighth Judicial District Court,
5 Case No. A-20-826196-C [ECF No. 1-1];
- 6 2. On December 13, 2020, Chicago Title filed a Petition for Removal to this Court [ECF
7 No. 1];
- 8 3. On January 12, 2021, DLJ filed a Motion for Remand [ECF No. 10];
- 9 4. On January 12, 2021, DLJ filed a Motion for Costs and Fees [ECF No. 11];
- 10 5. Chicago Title’s deadline to respond to DLJ’s Motion for Remand and Motion for
11 Costs and Fees is currently January 26, 2021;
- 12 6. Chicago Title’s counsel is requesting an extension until Tuesday, February 9, 2021, to
13 file its response to the pending Motion for Remand and Motion for Costs and Fees;
- 14 7. Chicago Title requests a brief extension of time to respond to the Motion for Remand
15 and Motion for Costs and Fees to afford Chicago Title additional time to respond to
16 the legal arguments set forth in DLJ’s motions;
- 17 8. DLJ does not oppose the requested extension;
- 18 9. This is the first request for an extension which is made in good faith and not for
19 purposes of delay;

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1 **IT IS SO STIPULATED** that Chicago Title's deadline to respond to DLJ's Motion for
2 Remand [ECF No. 10] and Motion for Costs and Fees [ECF No. 11] is hereby extended through
3 and including February 9, 2021.

4
5 Dated: January 22, 2021

EARLY SULLIVAN WRIGHT
GIZER & McRAE LLP

6
7 By: /s/-- Sophia S. Lau
8 SCOTT E. GIZER
9 SOPHIA S. LAU
Attorneys for Defendant CHICAGO TITLE
INSURANCE COMPANY

10 Dated: January 22, 2021

SINCLAIR BRAUN LLP

11 By: /s/-Kevin S. Sinclair
12 KEVIN S. SINCLAIR
13 Attorneys for Defendant CHICAGO TITLE
INSURANCE COMPANY

14 Dated: January 22, 2021

WRIGHT FINLAY & ZAK, LLP

15 By: /s/-Lindsay D. Robbins
16 LINDSAY D. ROBBINS
17 Attorneys for Plaintiff DLJ MORTGAGE
CAPITAL, INC.

18 **IT IS SO ORDERED:**

19
20 Dated: January 25, 2021

21 By: 
22 UNITED STATES JUDGE

CERTIFICATE OF SERVICE

I hereby certify that on January 22, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the Electronic Service List for this Case.

I declare under penalty of perjury under the laws of the United State of America that the foregoing is true and correct.

/s/ D'Metria Bolden

D'METRIA BOLDEN

An Employee of EARLY SULLIVAN

WRIGHT GIZER & McRAE LLP

